

THE HONORABLE JAMAL WHITEHEAD
WITHOUT ORAL ARGUMENT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSHUA A. DIEMERT, an individual,

Plaintiff,

v.

THE CITY OF SEATTLE, a municipal
corporation,

Defendant.

No. 2:22-CV-01640-JNW

**DECLARATION OF VICTORIA SLADE
IN SUPPORT OF REPLY IN SUPPORT
OF DEFENDANT'S MOTION FOR
BILL OF COSTS**

Note on Motion Calendar:
Monday, March 24, 2025

VICTORIA M. SLADE declares as follows:

1. I am an attorney at Davis Wright Tremaine LLP, attorneys of record for Defendant The City of Seattle ("Defendant" or "the City"). I make the statements in this Declaration based on personal knowledge and my review of my law firm's documentation of the costs incurred by Defendant in this case. I have further re-reviewed data in connection with this Reply. Based on my review of information and my other personal knowledge, the costs described in this Reply and Declaration are correct, were necessarily incurred, and services charged were actually and necessarily performed.

2. Attached as **Exhibit A** is a true and correct copy of Pacific Legal Foundation's Form 990 covering the year 2023.

3. Plaintiff deposed ten of Defendant's current or former employees in this case, and Defendant took the video deposition of Plaintiff in two volumes. The parties cited to eight of

1 these deposition transcripts the summary judgment briefing. In order to determine the
2 recoverable deposition costs, Defendant divided the total cost of each deposition by the number
3 of pages of the complete transcript in order to determine the cost per page. It then counted the
4 pages from each deposition that the parties cited in their briefs, and multiplied the total by the
5 cost per page to get the total for each deposition. Using this formula, the total submitted cost of
6 the cited deposition transcript pages was \$2,197.53.

7 4. Defendants incurred docket fees by obtaining documents in this case and in other
8 relevant cases necessary for this litigation.

9 5. I certify that each of the costs requested in this Declaration is correct and was
10 necessarily incurred in this case and that the services for which fees have been charged were
11 actually and necessarily performed.

12 I declare under penalty of perjury under the laws of the State of Washington and the
13 United States of America that the foregoing is true and correct.

14 Executed this 24 day of March, 2025 at Seattle, Washington.

15 /s/ Victoria M. Slade

16 Victoria M. Slade, WSBA #44597

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the document to which this Certificate of Service is attached to be served in the manner as indicated below:

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DATED this 24 day of March, 2025.

/s/ Lorrie Salinas-Malins

Lorrie Salinas-Malins, Legal Assistant

- ☐ Via Legal Messenger
- ☐ Via U.S. Mail, postage prepaid
- ☐ Via Federal Express
- ☐ Via Facsimile
- ☒ **Via Electronic Mail, per the Electronic Service Agreement**
- ☒ **Via CM/ECF**